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Attorneys for Defendant Victor Manuel Rodriguez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VICTOR MANUEL RODRIGUEZ,

Defendant.

Case No. CR 12-00723-EJD

STIPULATION AND [PROPOSED] ORDER
TO CONTINUE BRIEFING SCHEDULE

It is hereby stipulated and agreed to between plaintiff United States of America, through counsel of record, Daniel R. Kaleba and Stephen J. Meyer, Assistant United States Attorneys, and defendant Victor Manuel Rodriguez, through his counsel of record, Mark D. Flanagan and Michael A. Mugmon, that the December 19, 2014, due date for filing sentencing memoranda be rescheduled to January 9, 2015, in order to give the parties additional time to prepare for the hearing. The sentencing hearing is scheduled for January 29, 2015 at 1:30 p.m. Specifically, the parties require additional time to prepare their sentencing memoranda because they did not receive the U.S. Probation Office's Final Presentence Investigation Report until December 15, 2014. The parties further stipulate that responses to sentencing memoranda, if any, shall be filed no later than January 23, 2015.

1 SO STIPULATED.

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3 Dated: December 17, 2014

/s/ Mark D. Flanagan

MARK D. FLANAGAN
MICHAEL A. MUGMON

*Attorneys for Defendant
Victor Manuel Rodriguez*

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8 Dated: December 17, 2014

/s/ Stephen J. Meyer

DANIEL R. KALEBA
STEPHEN J. MEYER

Assistant United States Attorneys

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12 **[PROPOSED ORDER]**

13 Pursuant to the stipulation of the parties, and for good cause having been shown, IT IS
14 HEREBY ORDERED THAT the due date for defendant's filing of sentencing memoranda,
15 currently December 19, 2014, is rescheduled to January 9, 2015, and any responses thereto, if
16 any, shall be filed no later than January 23, 2015.

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18 Date: _____

Hon. Edward J. Davila
United States District Court Judge

ATTESTATION OF E-FILED SIGNATURE

I, Mark D. Flanagan, am the ECF User whose ID and password are being used to file this document. I hereby attest that Stephen J. Meyer has concurred in this filing.

Dated: December 17, 2014

/s/ Mark D. Flanagan
Mark D. Flanagan